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7 *Interim Class Counsel*

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10 UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 IN RE CALIFORNIA BAIL BOND
13 ANTITRUST LITIGATION

Master File No. 3:19-CV-000717-JST

CLASS ACTION

**DECLARATION OF ADAM GITLIN IN
SUPPORT OF PLAINTIFFS'
OPPOSITION TO DEFENDANTS'
MOTION FOR A PROTECTIVE ORDER
TEMPORARILY STAYING DISCOVERY
PENDING RESOLUTION OF MOTIONS
TO DISMISS**

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15 This Document Relates To:

16
17 ALL ACTIONS

18 Judge: The Honorable Jon S. Tigar

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20 I, Adam Gitlin, declare as follows:

21 I am an associate at the law firm of Lieff Cabraser Heimann & Bernstein, LLP ("Lieff
22 Cabraser"), which has been appointed Interim Class Counsel. I have personal knowledge of the
23 facts herein and, if called upon to testify to those facts, I could and would do so competently.

24 1. Attached hereto as Exhibit A is a true and correct copy of a letter from Dean M.
25 Harvey to Defendants' Counsel dated April 5, 2019, together with copies of the Northern
26 District's model ESI and protective orders, which were exhibits thereto.

27 2. Attached hereto as Exhibit B is a true and correct copy of a letter from Beatriz
28 Mejia to Dean Harvey dated April 12, 2019.

3. Attached hereto as Exhibit C is a true and correct copy of an email correspondence chain from Yaman Salahi of Plaintiffs' Counsel to Defendants' Counsel at Cooley LLP dated June 19, 2019 with a response from Jon Cieslak of Cooley LLP, dated June 25, 2019.

4. Attached hereto as Exhibit D is a true and correct copy of a letter from Dean M. Harvey to Bankers Insurance Company dated January 29, 2019.

* * *

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on the 22nd of July, 2019, in San Francisco, California.

/s/ Adam Gitlin
ADAM GITLIN

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CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2019, I caused the foregoing to be electronically filed and served with the Clerk of the Court using the CM/ECF system to all parties of record.

DATED: July 22, 2019

/s/ Dean M. Harvey
DEAN M. HARVEY
LIEFF CABRASER HEIMANN & BERNSTEIN, LLP